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8 *Debtors*

9 **UNITED STATES BANKRUPTCY COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**  
11 **SAN FRANCISCO DIVISION**

12 In re:

13 **PG&E CORPORATION,**

14 **- and -**

15 **PACIFIC GAS AND ELECTRIC COMPANY,**

16 **Debtors.**

- 17 ☐ Affects PG&E Corporation  
18 ☒ Affects Pacific Gas and Electric Company  
19 ☐ Affects both Debtors

20 *\* All papers shall be filed in the Lead Case,*  
21 *No. 19-30088 (DM).*

Jennifer L. Dodge (#195321)  
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Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administered)

**DECLARATION OF JENNIFER L.  
DODGE IN SUPPORT OF  
PACIFIC GAS AND ELECTRIC  
COMPANY'S OPPOSITION TO  
TODD GREENBERG'S MOTION  
TO AMEND CLAIMS NUMBERED  
77335 AND 76018 (GREENBERG  
CLAIMS)**

[Related to Dkt. No. 11992]

Hearing: March 29, 2022  
Time: 10:00 a.m. (Pacific Time)  
Place: (Tele/Videoconference Only)  
U.S. Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

1 I, Jennifer L. Dodge, pursuant to Section 1746 of Title 28 of the United States Code,  
2 hereby declare under penalty of perjury that the following is true and correct to the best of my  
3 knowledge, information, and belief:  
4

5 1. I am the owner and president of Law Offices of Jennifer L. Dodge Inc. and serve  
6 as legal counsel for Pacific Gas and Electric Company (the “**Utility**”), a wholly-owned subsidiary  
7 of PG&E Corporation (“**PG&E Corp.**”) and together with the Utility, the “**Debtors**,” or as  
8 reorganized pursuant to the Plan,<sup>1</sup> the “**Reorganized Debtors**” in the above-captioned chapter 11  
9 cases. I have been a member of the California State Bar Association since 1998 and am admitted  
10 to practice in the Northern District of California. I submit this Declaration in support of *Pacific*  
11 *Gas and Electric Company’s Opposition to Todd Greenberg’s Motion to Amend Claims*  
12 *Numbered 77335 and 76018 (Greenberg Claims)* (the “**Opposition**”)<sup>2</sup>, filed contemporaneously  
13 herewith.

14 2. Except as otherwise indicated herein, all facts set forth in this Declaration are  
15 based upon my personal knowledge and my review of relevant documents and information. If  
16 called upon to testify, I would testify competently to the facts set forth in this Declaration. I am  
17 authorized to submit this declaration on behalf of the Reorganized Debtors.

18 3. Attached as **Exhibit A** are true and correct copies of the following: A January 13,  
19 2022 email I sent to Richard Lapping, counsel for Claimant Todd Greenberg, attaching a redlined  
20 proposed Scheduling Order; the redlined proposed Scheduling Order attached to that email; and a  
21 January 14, 2022 email I received from Richard Lapping, indicating that Greenberg was  
22 considering a motion to amend the claims.

23 4. Attached as **Exhibit B** are true and correct copies of the following: A February 7,

24 <sup>1</sup> On January 29, 2019, the Debtors commenced with the Court voluntary cases under chapter 11  
25 of the Bankruptcy Code. By Order dated June 20, 2020 [Docket No. 8053], the Bankruptcy  
26 Court confirmed the *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of*  
27 *Reorganization Dated June 19, 2020* (as may be further modified, amended or supplemented  
from time to time, and together with any exhibits or schedules thereto, the “**Plan**”). The  
Effective Date of the Plan occurred on July 1, 2020. See Dkt. No. 8252.

28 <sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to  
them in the Opposition.

1 2022 email I sent to Richard Lapping attaching an updated proposed Scheduling Order and  
2 stating that the motion hearing dates were set for dates certain to coincide with the Court's regular  
3 hearing dates; the updated proposed Scheduling Order attached to that email; a February 8, 2022  
4 email I sent to Richard Lapping attaching an updated version of the Scheduling Order with the  
5 June 27-28, 2022 trial dates; and the updated version of the proposed Scheduling Order attached  
6 to that email.

7 5. Attached as Exhibit C are true and correct copies of the following: A February 9,  
8 2022 email I received from Richard Lapping, stating that the proposed changes to the scheduling  
9 order are acceptable, suggesting two minor revisions and attaching the revised proposed  
10 scheduling order; and the revised proposed scheduling order attached to that email.

11  
12 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true  
13 and correct to the best of my knowledge, information, and belief. Executed this 22nd day of  
14 March, 2022.

15  
16  
17 /s/ Jennifer L. Dodge  
Jennifer L. Dodge